BRAMMER® MANUFACTURING COMPANY
P.O. Box 3547 • Davenport, Iowa 52808 • (319) 326-2585 • Fax (800) 334-7230
Living Kitchens®

March 17, 1995

Mr. Lyndell Harrington
Chief, RCRA Branch,
U. S. Environmental Protection Agency, Region VII
726 Minnesota Ave.
Kansas City, Kansas 66101

Dear Mr. Harrington:

In response to the Notice of Violation Pursuant to Requirements of the Resource Conservation and Recovery Act received by Brammer Manufacturing Company (EPA ID Number IAD005264940), 1441 Rockingham Road, Davenport, IA 52802, from David N. Whiting, on March 10, 1995, I can report the following corrective actions taken and/or schedule for completion:

1. **"40 CFR 262.11 Inadequate hazardous waste determination on:**
   1. **Four drums outside,**
   2. **Cardboard on spray line,**
   3. **Spill on ground."**

   1. Brammer separated these drums and labeled them "D1", "D2", "D3", and "D4". We determined that two of these partially full drums, "D1" (approximately 10 gallons) and "D3" (approximately 20 gallons), were spoiled vinyl sealer, product number 370-330, which did not have its catalyst properly diluted for storage over our last Christmas shutdown. We have added this material, approximately 30 gallons total, to our Hazardous Waste Paint Related Material, and will ship it out on March 20, 1995.

      Drums "D2" and "D4" are our Rel Plaz Reducer. One drum is clearly marked as such. We had trouble with gloss and drying of our topcoat, and think we sent these two open drums outside because they "smelled funny". These drums are not hazardous waste and we will use them for their intended purpose.

   2. Brammer contacted an outside lab to make the hazardous waste determination on the cardboard. The lab will take at least two weeks for their tests. I will send you a copy of the results by April 15, 1995. This material will stay in use and not be disposed of until we make the determination.

3. Brammer cleaned up the spill of Durasyn clearcoat as detailed in 12 page "Attachment A".

2. **"40 CFR 265.171 & 173(b) Drums (3) in storage which appear to leak and rusted on bottom seam."**

The drums were not leaking, although they had material and rust on the bottom seam. We believe we dirtied the outside of the drum with hazardous waste at our satellite accumulation area. The material and rust came off quickly and easily down to shiny metal with a wire brush. On March 14, 1995 Brammer did properly transfer two drums of hazardous waste to new barrels. We transferred the third cited drum as well as a fourth additional drum on March 16, 1995.

3. **"40 CFR 262.34(a)(2) One drum not dated & others not visibly dated on 3/9/95."**

On March ninth and tenth Brammer moved drums to allow adequate aisle space and dated the drum. The EPA inspectors saw the change on March 10, 1995.

4. **"40 CFR 265.35 Inadequate aisle space in storage area (Tin Shed)."**

On March ninth and tenth Brammer moved drums to allow adequate aisle space. The EPA inspectors saw the change on March 10, 1995.

5. **"40 CFR 265.34 Inadequate access to alarm or communication device at container storage areas."**

We will have a phone installed next to the hazardous waste storage. TIE Systems will do the work, with an estimated completion date of March 24, 1995. We will store all hazardous waste at this location.

6. **"40 CFR 262.173 Satellite accumulation drum not closed."**

Brammer understands that this citation should be "40 CFR 265.173". Brammer believes the satellite accumulation drum was adequately closed. The lid was on the drum with the drum and lid lip mated. We now require that the drum be sealed with a locking ring when not being filled.

7. **"40 CFR 262.34(c)(ii) Satellite accumulation drum not marked."**

The satellite accumulation drum had been started within 30 minutes of the inspection. Our procedure had been for the machine operator to get Bob West to label the drum. Bob West was meeting with the RCRA inspectors at this

time. Brammer trained the operators to label their own drums on March 15, 1995.

8. **"40 CFR 265.16(d) No written description of personnel training."**

   Brammer will have a new written description of personnel training by March 24, 1995.

9. **"40 CFR 265.52(c) Inadequate contingency plan description of arrangements with local authorities."**

   Brammer is updating the contingency plan to assure compliance. We will complete the update and I will send you a copy by April 15, 1995.

10. **"40 CFR 265.52(d) Inadequate emergency coordinator list information."**

    Brammer is updating the contingency plan to assure compliance. We will complete the update and I will send you a copy by April 15, 1995.

11. **"40 CFR 265.52(e) No emergency equipment list & description in contingency plan.**

    Brammer is updating the contingency plan to assure compliance. We will complete the update and I will send you a copy by April 15, 1995.

In summary, we feel we have properly addressed items 1.1, 1.3, 2, 3, 4, 6, and 7, above. We plan to complete items 5 and 8 with confirmation to you by March 24, 1995. We plan to complete items 1.2, 9, 10, and 11 with confirmation to you by April 15, 1995. We are working hard to improve our waste handling procedures.

Sincerely,
BRAMMER MANUFACTURING COMPANY

Chip Hawkinson

Chip Hawkinson
Quality Control Manager/Safety Director

cc Mr. Terry Dickey, Brammer Manufacturing Company

Attachment A

BRAMMER MANUFACTURING COMPANY

On March 9, 1995 on a walk thru inspection with Alma Moreno Lahm, David N. Whiting, Chip Hawkinson, and myself, Robert West, we discovered a spilled drum of Durasyn clearcoat from Valspar. As we were walking out in the yard on the southwest side of the heat shed, the inspector, David, and myself walked by the two drums when Alma called us back to ask what was on the ground. At first I thought it was snow. It was white with a dirty look to it. After closer inspection, I saw it was clear coat from a drum that had not been sealed back up properly nor placed in the right place properly. After finding the spill, I went right into the procedure outlined in the Emergency Response Plan.

I first notified Chip Hawkinson who was standing right with us. I then selected the appropriate personal protective gear to wear which was rubber gloves, safety glasses, and an outer coat. I then cleaned up the spill, which I feel was a small spill classified to us a less than five gallons, placed in a five gallon can and placed it in the hazardous waste barrel. There was no ventilation systems to worry about since the spill happened outside and no evacuation was necessary. There was a fire extinguisher within ten feet of the spill while clean up was going on. After the EPA left, I went out and continued the clean up by digging a hole approximately three feet by two feet by eight inches deep. I found no residue to have leaked into the ground as I was digging. I took the dirt I dug up and placed it also in the hazardous waste barrel. I then went to a pile of rock left over from snow plowing took the rock and filled the hole. The shovel, rake, and pick I used were then cleaned off with solvent, dried with a rag, and then returned to there locations. The rags were placed in the properly marked containers.

The material which spilled was DURASYN CLEARCOAT. I have attached the material safety data sheet with this report. There was approximately two gallons of spilled material. It was dry and white in color. This is not enough of a spill to report to the proper authorities.

ROBERT WEST
FOREMAN, BRAMMER MANUFACTURING CO.

Received 3/10/95 from Bob. Chip

MATERIAL SAFETY DATA SHEET

********** SECTION 1: PRODUCT IDENTIFICATION **********

MANUFACTURERS ADDRESS : 1101 THIRD STREET SOUTH, MINNEAPOLIS, MN 55415
MFG TELEPHONE NUMBER : (612) 332-7371
24 HR EMERGENCY PHONE NO : 1-800-228-5635
CHEMICAL NAME OR FAMILY : PAINT PRODUCT
FORMULA : AUF0390
TRADE NAME : DURASYN CLEARCOAT
ISSUE DATE : 01-02-95 DATE PRINTED : 01-04-95

********** SECTION 2: HAZARDOUS INGREDIENTS **********

NAME	WT %	
*COMMON(NA):ETHYLBENZENE	7.0%	TLV TWA 100.00 PPM TLV STEL 125.00 PPM
CAS:100-41-4 CHEMICAL: BENZENE, ETHYL		OSHA PEL 100.00 PPM CEILING NOT ESTAB RECOMND NOT ESTAB
*COMMON(NA):XYLENE	34.3%	TLV TWA 100.00 PPM TLV STEL 150.00 PPM
CAS:1330-20-7 CHEMICAL: PHENYL,DIMETHYL		OSHA PEL 100.00 PPM CEILING NOT ESTAB RECOMND NOT ESTAB
COMMON(NA):ISOBUTYL ALCOHOL	4.2%	TLV TWA 50.00 PPM TLV STEL NOT ESTAB
CAS:78-83-1 CHEMICAL: 1-PROPANOL, 2-METHYL-		OSHA PEL 50.00 PPM CEILING NOT ESTAB RECOMND NOT ESTAB
COMMON(NA):VM&P NAPHTHA	1.6%	TLV TWA 300.00 PPM TLV STEL NOT ESTAB
CAS:64742-89-8 CHEMICAL: SOLVENT NAPHTHA (PETRO-LEUM),LIGHT ALIPH.		OSHA PEL NOT ESTAB CEILING NOT ESTAB RECOMND NOT ESTAB
*COMMON(NA):TOLUENE	5.3%	TLV TWA 100.00 PPM TLV STEL 150.00 PPM
CAS:108-88-3 CHEMICAL: PHENYL, METHYL		OSHA PEL 100.00 PPM CEILING NOT ESTAB

*COMMON(1):FORMALDEHYDE

CAS:50-00-0 CHEMICAL: FORMALDEHYDE

0.5% TLV TWA 0.30 PPM
TLV STEL 0.30 PPM
OSHA PEL 0.75 PPM
CEILING NOT ESTAB
REGOMND NOT ESTAB

*COMMON(NA):METHYL ALCOHOL

CAS:67-56-1 CHEMICAL: METHANOL

4.0% TLV TWA 200.00 PPM
TLV STEL 250.00 (02)
OSHA PEL 200.00 (02)
CEILING NOT ESTAB
REGOMND NOT ESTAB

MATERIAL SAFETY DATA SHEET

********** SECTION 2: HAZARDOUS INGREDIENTS ****CONTINUED****

COMMON(NA): ISOPROPYL ALCOHOL — 5.0% TLV TWA 400.00 PPM
TLV STEL 500.00 PPM
CAS: 67-63-0 CHEMICAL: 2-PROPANOL OSHA PEL 400.00 PPM
CEILING NOT ESTAB
RECOMND NOT ESTAB

CHEMICALS NOTED WITH A (*) ARE REPORTABLE UNDER SECTION 313 OF SARA TITLE III

(1) = THIS MATERIAL IS A CARCINOGEN PER NTP,IARC,ACGIH
(2) = PPM SKIN

ALL COMPONENTS OF THIS PRODUCT ARE LISTED IN THE U.S. TSCA CHEMICAL SUBSTANCE INVENTORY.

********** SECTION 3: PHYSICAL DATA **********

BOILING POINT: 148 DEG F.
VAPOR PRESSURE MM HG AT 68 DEG F: 96.0
VAPOR DENSITY (AIR = 1.0): 3.8
SPECIFIC GRAVITY: 0.95
PERCENT VOLATILE BY VOLUME: 69.16
EVAPORATION RATE (BUTYL ACETATE = 1): 4.6
SOLUBILITY IN WATER: NO
APPEARANCE AND ODOR: NORMAL FOR A COATINGS PRODUCT.

********** SECTION 4: FIRE AND EXPLOSION HAZARD **********

FLASH POINT TCC/PM DEG F : 40
LOWER EXPLOSIVE LIMIT : 1.00
UPPER EXPLOSIVE LIMIT : 37.00

EXTINGUISHING MEDIA: CARBON DIOXIDE, DRY CHEMICAL, FOAM, AND/OR WATER FOG.

SPECIAL FIRE FIGHTING PROCEDURES:
FIRE FIGHTERS MUST WEAR SELF CONTAINED BREATHING APPARATUS OR AIR MASKS.
CONTAINERS EXPOSED TO FIRE SHOULD BE KEPT COOL WITH WATER SPRAY.

UNUSUAL FIRE AND EXPLOSIVE HAZARDS:
CONTAINS OXIDIZING MATERIALS. CONTAMINATED RAGS, WIPES, SAWDUST, ETC. MAY CATCH FIRE SPONTANEOUSLY. STORE WASTE UNDER WATER IN CLOSED METAL CONTAINERS UNTIL DISPOSED OF IN COMPLIANCE WITH ALL APPLICABLE REGULATIONS.

THRESHOLD LIMIT VALUE: NOT REQUIRED FOR MIXTURE.

EFFECTS OF OVEREXPOSURE:

IMMEDIATE EFFECTS (ACUTE):

EYE IRRITATION.

HARMFUL IF INHALED. MAY AFFECT THE BRAIN, NERVOUS SYSTEM OR RESPIRATORY SYSTEM, CAUSING DIZZINESS, HEADACHE, NAUSEA OR RESPIRATORY

********** SECTION 5: HEALTH HAZARD DATA ****CONTINUED****

IRRITATION.
MAY BE HARMFUL IF ABSORBED THROUGH SKIN.
CONTAINS INGREDIENT WHICH IS CONSIDERED HIGHLY TOXIC.
OVEREXPOSURE TO INGREDIENTS IN THIS PRODUCT MAY CAUSE NOSE AND THROAT IRRITATION, EYE IRRITATION, EYE BURNS, SKIN IRRITATION, ALLERGIC SKIN REACTION, FATALITY IF SWALLOWED, LIVER DAMAGE, KIDNEY DAMAGE, CNS DEPRESSION, RESPIRATORY TRACT IRRITATION, DERMATITIS, CAUSE BLINDNESS, CORNEAL INJURY/EYE DAMAGE.

DELAYED EFFECTS (CHRONIC):
CONTAINS FORMALDEHYDE WHICH IS CONSIDERED A POTENTIAL CARCINOGEN BY THE OCCUPATIONAL HEALTH AND SAFETY ADMINISTRATION.
SUSPECT CANCER HAZARD. CONTAINS INGREDIENTS WHICH MAY CAUSE CANCER.
RISK OF CANCER DEPENDS UPON DURATION AND LEVEL OF EXPOSURE.
NOTICE: REPORTS HAVE ASSOCIATED REPEATED AND PROLONGED OCCUPATIONAL OVEREXPOSURE TO SOLVENTS WITH PERMANENT BRAIN AND NERVOUS SYSTEM DAMAGE. INTENTIONAL MISUSE BY DELIBERATELY CONCENTRATING AND INHALING THE CONTENTS MAY BE HARMFUL OR FATAL.
POSSIBLE SKIN AND RESPIRATORY SENSITIZER.
CONTAINS INGREDIENTS WHICH MAY CAUSE LIVER DAMAGE, KIDNEY DAMAGE, CORNEAL INJURY/EYE DAMAGE, PULMONARY EDEMA.

MEDICAL CONDITIONS GENERALLY AGGRAVATED BY EXPOSURE: ANY RESPIRATORY OR SKIN CONDITION.

EMERGENCY AND FIRST AID PROCEDURES:
EYE CONTACT: FLUSH IMMEDIATELY WITH PLENTY OF WATER FOR AT LEAST 15 MINUTES AND GET MEDICAL ATTENTION.
SKIN CONTACT: WASH THOROUGHLY WITH SOAP AND WATER.
INHALATION: IF INHALED, REMOVE TO FRESH AIR. IF NOT BREATHING, GIVE ARTIFICIAL RESPIRATION. IF BREATHING IS DIFFICULT, GIVE OXYGEN. GET MEDICAL ATTENTION IMMEDIATELY.
SWALLOWING: IF SWALLOWED, INDUCE VOMITING IMMEDIATELY AS DIRECTED BY MEDICAL PERSONNEL. NEVER GIVE ANYTHING BY MOUTH TO AN UNCONSCIOUS PERSON.
POISON! GET MEDICAL ATTENTION IMMEDIATELY.
GET MEDICAL ATTENTION IMMEDIATELY.

POSSIBLE ROUTES OF ENTRY: INHALATION, INGESTION, SKIN ABSORBTION.

********** SECTION 6: REACTIVITY DATA **********

THIS PRODUCT IS STABLE
CONDITIONS TO AVOID: NONE

HAZARDOUS POLYMERIZATION: NONE

********** SECTION 7: SPILL OR LEAK PROCEDURES **********

VENTILATE AREA. AVOID BREATHING OF VAPORS. USE SELF-CONTAINED BREATHING APPARATUS OR AIRMASK FOR LARGE SPILLS IN A CONFINED AREA. ELIMINATE IGNITION SOURCES. REMOVE WITH INERT ABSORBENT AND NON-SPARKING TOOLS. AVOID ALL PERSONAL CONTACT.

WASTE DISPOSAL METHOD:
DISPOSE IN CHEMICAL DISPOSAL AREA OR IN A MANNER THAT COMPLIES WITH LOCAL, STATE, AND FEDERAL REGULATIONS. DO NOT INCINERATE CLOSED CONTAINERS.

********** SECTION 8: SPECIAL PROTECTION INFORMATION **********

RESPIRATORY PROTECTION:
WEAR APPROPRIATE, PROPERLY FITTED RESPIRATOR (NIOSH/MSHA APPROVED) DURING AND AFTER APPLICATION UNLESS AIR MONITORING VAPOR/MIST LEVELS ARE BELOW APPLICABLE LIMITS. FOLLOW RESPIRATOR MANUFACTURERS DIRECTIONS FOR RESPIRATOR USE.

VENTILATION:
REQUIRED FOR SPRAYING OR IN A CONFINED AREA, VENTILATION EQUIPMENT SHOULD BE EXPLOSION PROOF. ELIMINATE IGNITION SOURCES

PROTECTIVE GLOVES: USUAL HAND PROTECTION FOR PAINT APPLICATION.
EYE PROTECTION: FOR SPRAY APPLICATION, USE CHEMICAL GOGGLES AS A MINIMUM. OTHERWISE, USE SAFETY GLASSES WITH SIDE SHIELDS AS A MINIMUM.
OTHER PROTECTIVE EQUIPMENT: USUAL CLOTHING FOR PAINTING OPERATIONS.

********** SECTION 9: SPECIAL PRECAUTIONS **********

PRECAUTIONS TO BE TAKEN IN HANDLING AND STORAGE:

CONTAINERS SHOULD BE GROUNDED/BONDED WHEN POURING. AVOID FREE FALL OF LIQUID IN EXCESS OF A FEW INCHES.
KEEP AWAY FROM HEAT, SPARKS AND OPEN FLAMES. KEEP CONTAINER CLOSED WHEN NOT IN USE. DO NOT STORE ABOVE 120 DEG F. BASED ON THE PRODUCT FLASH POINT AND VAPOR PRESSURE SUITABLE STORAGE SHOULD BE PROVIDED IN ACCORDANCE WITH OSHA REGULATION 1910.106. EMPTY CONTAINERS MAY CONTAIN PRODUCT RESIDUE, INCLUDING FLAMABLE OR EXPLOSIVE VAPORS. DO NOT CUT, PUNCTURE OR WELD ON OR NEAR CONTAINER. ALL LABEL WARNINGS MUST BE OBSERVED UNTIL THE CONTAINER HAS BEEN CLEANED OR RECONDITIONED.

IARC-INTERNATIONAL AGENCY FOR RESEARCH ON CANCER; LEL-LOWER EXPLOSIVE LIMITS; UEL-UPPER EXPLOSIVE LIMITS; MG CU M-MILLIGRAMS PER METERS CUBED; MM-MILLIMETERS MPPCF-MILLIONS OF PARTICLES PER CUBIC FOOT; MSHA-MINE SAFETY AND HEALTH ADMINISTRATION; NA-NOT APPLICABLE; NIOSH-NATIONAL INSTITUTE OF OCCUPATIONAL SAFETY AND HEALTH; NOT EST-NOT ESTABLISHED; NTP-NATIONAL TOXICOLOGY PROGRAM; PB-LEAD; PEL-PERMISSIBLE EXPOSURE LEVEL; PPM-PARTS PER MILLION; TCC/PM-TAG CLOSED CUP/PENSKY-MARTEN; RECM-RECOMMENDED; TLV-THRESHOLD LIMIT VALUES.

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SPILL CONTROL PROCEDURES

Procedure for Small Spills

A. Small spills are five gallons or less. Small spills must be reported to the Emergency Response Coordinator.

B. Immediate clean up must be accomplished to reduce safety hazards and to prevent spreading.

C. Use gloves, respirators (if trained and authorized), boots or other protective equipment as needed.

D. Use absorbent. (Dirty stain wiping rags, clean wiping rags, sawdust, oil dry)

E. Activate ventilation system.

F. If material is flammable or combustible, bring a fire extinguisher all necessary fire brigade members into the area. Keep sources of ignition away.

G. Turn off any equipment which might be reached by the spilled material.

H. Scoop up the spilled material with cardboard or a shovel and put into a proper waste receptacle. Appropriately handle those materials classified as hazardous waste.

I. Wipe up with rags. Place used rags in a proper dirty rag container.

J. Mop up with appropriate cleaning solution if necessary.

K. Use water, non-combustible or non-flammable solvents for clean up whenever possible.

L. Flammable solvent used for clean up must be kept in approved safety containers.

M. Any mops used with flammable or combustible material must be cleaned, wrung out and hung up to dry in a well ventilated area away from any source of heat, flame or spark.

Procedure for Large Spills

A. Large spills are over five gallons. Large spills must be reported to the Emergency Response Coordinator.

B. Flammable spills of more than one drum, or that are at unusually risk of fire, explosion, or location, must be handled by the Davenport Fire Department. Activate the Emergency Response system.

C. Shutdown and/or remove from the area any operations which might generate heat or sparks or cause congestion. Remove employees who are not involved in the clean up.

D. Immediate clean up must be accomplished to reduce the safety hazard and prevent spreading.

E. Notify supervisors through out the plant about the spill as a need to evacuate the plant could develop.

F. If material is flammable or combustible, bring the necessary fire extinguishing equipment and fire brigade members to the area.

G. Activate ventilation system if available. Insure adequate movement to the outside with approved fans or open doors or windows if necessary.

H. Use gloves, respirators (if trained and authorized), boots and other personal protective equipment as necessary.

I. Use absorbent. (Dirty stain wiping rags, clean wiping rags, sawdust, oil dry)

J. Scoop up the spilled material with cardboard or a shovel and put into a proper waste receptacle. Appropriately handle those materials classified as hazardous waste.

K. Mop up with appropriate cleaning solution, as needed.

L. Wipe up with rags and dispose of rags properly.

M. Use water, non-combustible or non-flammable solvent for clean up whenever possible.

N. If flammable or combustible solvent must be used for mopping (do not flood area), use the smallest quantity possible, but not to exceed 75 square feet wet for combustible solvents and 25 square feet for flammable solvents. It may be necessary to restrict these areas depending on the adequacy of ventilation and the fire and health hazards.

AMMER MANUFACTURING CO.
P.O. BOX 3547
DAVENPORT, IOWA 52808

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Chief, RCRA Branch
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